

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

)	
FRONTLINE SECURITY)	
SERVICES, LLC,)	
)	
Employer,)	
)	
and)	Case No. 10-RC-147443
)	
INTERNATIONAL UNION, SECURITY)	
POLICE AND FIRE PROFESSIONALS)	
OF AMERICA)	
)	
Petitioner,)	
)	
INDUSTRIAL, TECHNICAL &)	
PROFESSIONAL EMPLOYEES)	
UNION, OPEIU LOCAL 4873, AFL-CIO)	
)	
Proposed Intervenor.)	

MOTION FOR LEAVE TO FILE BRIEF AS *AMICUS CURIAE*

The American Federation of Labor and Congress of Industrial Organizations moves for leave to file the accompanying brief as *amicus curiae*. The AFL-CIO is a federation of 56 national and international labor organizations with a total membership of approximately 12.5 million working men and women.

At issue in this case is whether the Board should abandon the rule enunciated in *University of Chicago*, 272 NLRB 873 (1984), which holds that Section 9(b)(3) of the National Labor Relations Act prohibits “mixed unions” of security and non-security members from appearing on the ballot during NLRB conducted elections. As an organization whose affiliated

national and international unions and their locals are all mixed unions, the AFL-CIO has a vital interest in this case.

The AFL-CIO therefore respectfully requests that the Board grant leave for the AFL-CIO to file the accompanying brief as *amicus curiae*.

Respectfully submitted,

/s/ Craig Becker
Lynn K. Rhinehart
Craig Becker
Yona Rozen
815 Sixteenth Street, NW
Washington, DC 20006
(202) 637-5385